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DATE FILED: 05/22/2025

May 21, 2025

Via ECF

Hon. Andrew L. Carter, Jr. District Court Judge **United States Courthouse** 500 Pearl Street New York, New York 10007

Re: Layco v. SSA

24 Civ. 8880 (ALC)

## Dear Judge Carter:

As the attorney for the plaintiff in the above captioned action, I write to request an extension of time to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed Friday, May 23, 2025.

I seek additional time to file plaintiff's Motion for Judgment on the Pleadings owing to multiple matters due at the same time coupled with several administrative hearings over the past month that consumed more time than previously anticipated. With the kind consent of opposing counsel, AUSA Candace Casey Brown, I respectfully request that the Court extend and approve the following revised briefing schedule:

June 13, 2025 Plaintiff's Motion for Judgment on the Pleadings

August 12, 2025 Defendant's Opposition/Cross-Motion for Judgment on the Pleadings

Plaintiff's Reply September 2, 2025

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

Christopher J. Bowes, Esq. Christopher J. Bowes, Esq.

Cc: Candace Casey Brown, Esq.

> HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE May 22, 2025

New York, NY